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*Attorneys for Defendant, Eastern Airlines, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TEAM 125, INC., a Delaware corporation,

Plaintiff,

v.

EASTERN AIRLINES, LLC a Nevada  
limited liability company; and DOES 1  
through 20, and ROE ENTITIES 1-20,  
inclusive,

Defendant.

CASE NO.: 2:21-cv-00520-KJD-NJK

**STIPULATION FOR  
DISCONTINUANCE OF ACTION WITH  
PREJUDICE**

Defendant Eastern Airlines, LLC (“Defendant”) and Plaintiff Team 125, Inc. (“Plaintiff,” and together with Defendant, the “Parties”), through their respective undersigned counsel, hereby stipulate and request that this Court terminate the present action in its entirety, pursuant to a confidential resolution reached between the Parties, and in support state as follows:

1. On March 22, 2023, the Court granted Defendant’s Motion to Dismiss Plaintiff’s Amended Complaint, with Prejudice [ECF No. 41] (the “Dismissal Order”).
2. On March 23, 2023, the Court granted Defendant’s Motion for Sanctions [ECF No. 43] (the “Sanctions Order”).

- 1        3. Since that time the Parties have been negotiating a mutual resolution of the discontinuance  
2        of the present action, including all rights of appeal,<sup>1</sup> as well as Defendant's entitlement to  
3        an award of fees and costs.
- 4        4. The Parties have reached a confidential agreement between themselves which fully  
5        resolves this matter, including all rights of appeal with regard to the Dismissal Order and  
6        the Sanctions Order.
- 7        5. Based on that agreement, Defendants no longer need to file an application for fees and  
8        costs pursuant to the Sanctions Order.
- 9        6. Accordingly, the Parties stipulate that all remaining deadlines in this case may be vacated,  
10       and the case may be closed.

11       IT IS SO STIPULATED.

12       Dated this 31<sup>st</sup> day of May 2023.

12       Dated this 31<sup>st</sup> day of May 2023.

13       Respectfully submitted,

13       Respectfully submitted,

14       GARMAN TURNER GORDON LLP

14       GREENSPOON MARDER LLP

15       /s/ Erika Pike Turner

15       /s/ Phillip A. Silvestri

16       ERIKA PIKE TURNER

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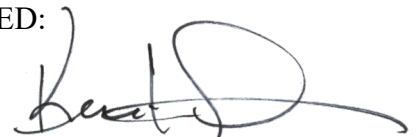
18       Las Vegas, Nevada 89119

18       Las Vegas, Nevada 89169

18       *Attorneys for Defendant, Eastern Airlines,*  
19       *LLC*

18       *Attorneys for Plaintiff, Team 125, Inc.*

21       IT IS SO ORDERED:



23       UNITED STATES DISTRICT COURT JUDGE

24       DATED: 5/31/2023

27       \_\_\_\_\_  
28       <sup>1</sup> The Parties acknowledge that, as of the date of this Stipulation, the deadline to appeal the Dismissal Order and the Sanctions Order has passed, and thus all rights to appeal have been extinguished.

**CERTIFICATE OF SERVICE**

The undersigned, an employee of Garman Turner Gordon LLP, hereby certifies that on the 31<sup>st</sup> day of May 2023, he caused a copy of the foregoing **STIPULATION FOR DISCONTINUANCE OF ACTION WITH PREJUDICE** to be served electronically to all parties of interest through the Court's CM/ECF system as follows:

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*Attorneys for Plaintiff, Team 125, Inc.*

/s/ Max Erwin

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